



Filed Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: MB Docket No. 12-31
Petition of Fox Networks Group, Inc. for Waiver of the Network
Representation Rule. 47 C.F.R. § 73.658(i)

Dear Ms. Dortch:

On behalf of Hero Licenseco LLC ("Hero"), licensee of television broadcast station KMOH-TV, Kingman, Arizona, I am writing to urge the Commission to grant the above-referenced petition for waiver filed January 23, 2012 by Fox Networks Group, Inc.

Station KMOH is in the Phoenix DMA, and Hero is excited to be a charter affiliate of the proposed MundoFox broadcast network in that DMA. MundoFox will bring new and diverse programming to Hispanic-American television viewers nationwide. This is consistent with the Commission's longstanding goals of increasing diversity and competition on our nation's airwaves. Hero looks forward to providing Latinos with free, over-the-air access to a wealth of new content, while at the same time competing with other television stations in the Phoenix market.

Grant of Fox's waiver request is critical to the success of this new network service. Hero knows as well as the Commission that launching a new Spanish-language broadcast network requires an enormous commitment of financial resources - by both the network and its affiliates. In order to justify making that commitment, Hero will need a strong partner to help it sell spot advertising. Spot advertising sales are the lifeblood of local television stations, providing the economic resources necessary to allow stations like ours to invest in high-quality programming. Upfront sales to advertisers represent the best way to lock in this critical revenue stream.

However, Station KMOH does not have the resources to engage in the upfront process independently. Furthermore, it is very difficult to find experienced sales representatives competent to handle this work for a Spanish-language station. Given Fox's expertise in competing in the advertising marketplace, we are confident that partnering with Fox would give us

the best opportunity to attract vital local and national advertising at the upfront presentations to prospective advertisers scheduled for this May.

Additionally, it is Hero's experience that advertisers continue to subject minority-targeted stations to pricing discounts. One way to work around this problem is to partner with an effective sales representative with the experience and contacts to help balance the playing field. Given the degree to which major national representation firms focus their businesses on English-language advertising, Hero believes that Fox is the best choice for such representation. Indeed, all of the Spanish-language stations against which we compete are permitted to rely upon their own network partners when it comes to advertising sales, thanks to the FCC's history of granting waivers of the network representation rule to other Spanish-language networks. Thus, Hero requests that Station KMOH be provided the same opportunity.

In sum, Hero would find it virtually impossible to compete effectively with far more powerful stations, both Spanish- and English-language, in the Phoenix market without an ability to rely upon Fox as our sales representative. Before re-branding our station and taking on the risk of an entirely new business venture, we need some assurance that we can get assistance from Fox in achieving our advertising goals.

Thus, Hero urges the Commission to grant Fox's waiver petition as soon as possible, so that we and MundoFox can maximize our chance to sell enough advertising to enable the new network to launch by September as planned. Together with MundoFox, we are confident that we can bring Latino audiences an exciting new programming opportunity - but we must be given the chance to compete fairly in the market.

For all of these reasons, we urge you to expeditiously grant Fox's waiver request. Should you have any questions, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Robert Behar", written in a cursive style.

Robert Behar, President
Hero Broadcasting LLC